

Office of Regulatory Staff 1401 Main Street Suite 900 Columbia, SC 29201 (803) 737-0800 ORS.SC.GOV

ANDREW M. BATEMAN Deputy Chief Counsel for ORS

September 25, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: South Carolina Energy Freedom Act (H.3659) Proceeding to Establish Duke Energy Progress, LLC's and Duke Energy Carolinas, LLC's Standard Offer, Avoided Cost Methodologies, Form Contract Power Purchase Agreements, Commitment to Sell Forms, and Any Other Terms or Conditions Necessary (Includes Small Power Producers as Defined in 16 United States Code 796, as Amended) – S.C. Code Ann. Section 58-41-20(A)

Docket Nos. 2019-185-E and 2019-186-E

Dear Ms. Boyd:

On September 25, 2019, Johnson Development Associates, Incorporated and the South Carolina Solar Business Alliance, Incorporated (collectively referred to herein as "Joint Petitioners") filed a Joint Petition for Rehearing or Reconsideration of Commission Order No. 2019-111-H ("Order"). According to the South Carolina Administrative Procedures Act ("APA"), "all parties must be afforded an opportunity for hearing after notice of not less than thirty days...." The South Carolina Office of Regulatory Staff supports and concurs with Joint Petitioners and objects to the Order to the extent it violates the APA.

Sincerely,

Andrew M. Bateman

cc: All Parties of Record (via E-Mail)

¹See S.C. Code Ann. § 1-23-320.